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MAR 10 2023

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
DEPUTY

UNITED STATES OF AMERICA

v.

FRANKLIN BARNEY JR.,

Defendant.

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CRIMINAL NO.

(Conspiracy to Distribute and Possess  
with Intent to Distribute Fentanyl and  
Cocaine, 21 U.S.C. § 846; Forfeiture, 21  
U.S.C. § 853; 18 U.S.C. § 2461; Fed. R.  
Crim. P. 32.2(a))

ELH 23cr88

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INFORMATION

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl and Cocaine)

The United States Attorney for the District of Maryland charges that:

Beginning in or about December 2021, and continuing through in or about February 2022,  
in the District of Maryland, the defendant,

**FRANKLIN BARNEY JR.,**

did knowingly and willfully combine, conspire, confederate, and agree with others known and unknown to the United States Attorney for the District of Maryland to knowingly, intentionally, and unlawfully distribute and possess with intent to distribute more than 400 grams of fentanyl, a Schedule II controlled substance, and more than 5 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

21 U.S.C. § 846

**FORFEITURE ALLEGATION**

The United States Attorney for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 28 U.S.C. § 2461(c) and the other statutes cited herein, in the event of the Defendant's conviction.

**Narcotics Forfeiture**

2. Pursuant to 21 U.S.C. § 853(a), upon conviction of an offense in violation of the Controlled Substances Act, as alleged in the Narcotics Count(s), the Defendant shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offense; and
- b. any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, the offense.

**Substitute Assets**

3. Pursuant to Title 21, United States Code, Section 853(p), if any of the property described above as being subject to forfeiture, as a result of any act or omission by the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the Defendant up to the value of the property charged with forfeiture in the paragraphs above.

**Property Subject to Forfeiture**

4. The property to be forfeited includes, but is not limited to, the following:
- a. \$62,798 in U.S. currency seized during the execution of a search warrant at 12401 Brickyard Blvd, Beltsville, Maryland, on or about February 25, 2022;
  - b. \$278,701 in U.S. currency seized during the execution of a search warrant at 222 E. Saratoga Street, Baltimore, Maryland, on or about February 25, 2022;
  - c. \$45,983 in U.S. currency seized during the execution of a search warrant on a Ford F-350 parked in the vicinity of 12401 Brickyard Blvd, Beltsville, Maryland, on or about February 25, 2022;
  - d. one Glock 27 semi-automatic handgun, obliterated serial number;
  - e. one Glock 27, .40 caliber firearm, serial number MCC291;
  - f. 13 rounds of .40 caliber ammunition;
  - g. one Ruger SR40C semi-automatic handgun, serial number 345-13855;
  - h. one Smith and Wesson SD40 VE semi-automatic handgun with a silver slide, serial number FWS2620;
  - i. 14 rounds of .40 caliber ammunition;
  - j. 35 rounds of 9mm ammunition;
  - k. a 2016 Chevy Tahoe, bearing vehicle identification number 1GNSCBKC3GR364994 seized from 12401 Brickyard Blvd, Beltsville, Maryland, on or about February 25, 2022;
  - l. assorted jewelry items seized during the execution of a search warrant at 222 E. Saratoga Street, Baltimore, Maryland, on or about February 25, 2022 (appraised value at seizure: approx. \$555,095.00); and
  - m. one 20K yellow gold byzantine link chain and 20K yellow gold pendant (appraised value at seizure: approx. \$5,400).

21 U.S.C. § 853  
18 U.S.C. § 2461  
Fed. R. Crim. P. 32.2(a)

*Erek L. Barron*

Erek L. Barron  
United States Attorney

*Joan Castleton Mathias*

Digitally signed by  
JOAN MATHIAS  
Date: 2023.03.09  
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